Louisiana Department of Environmental Quality (LDEQ) Office of Environmental Services

STATEMENT OF BASIS

Amite Foundry
Amite Foundry & Machine Inc
Amite, Tangipahoa Parish, Louisiana
Agency Interest Number: 2093
Activity Number: PER20060001
Proposed Permit Number: 2840-00032-V1

I. APPLICANT

Company:

Amite Foundry & Machine Inc 13040 Foulks Ln Amite, Louisiana 70422-9209

Facility:

Amite Foundry & Machine Inc. 13040 Foulks Ln Amite, Tangipahoa Parish, Louisiana Approximate UTM coordinates are 738.574 kilometers East and 3404.284 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Amite Foundry & Machine Inc is a designated Part 70 source and currently operates under Permit No. 2840-00032-V0, issued October 5, 1999.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on May 19, 2006 requesting a Part 70 operating permit renewal for the Amite Foundry.

Project

The United States steel industry has started to recover from a depression it suffered for almost a decade. The revised market outlook and forecasts of Amite Foundry and Machine, Inc. (AFM) work orders indicate that this facility may not be able to comply with the previously requested production limits to maintain and improve profitability in the next five years. AFM therefore requests to increase the permitted production level for the AFM from 20,000 tons to 27,950 tons of metal produced in the Electric Arc Furnaces (EAFs) and to maintain the current status of the facility as a Major Source under Title I and Title V of the Act. ACT also requests to withdrawals of the Minor Source Permit applications submitted to LDEQ in April 2004, May 2005, and April 2006.

No changes in the method of operation are required in the application. The facility has the capacity to produce the required quantity of metal using current equipment and the established production operations. In order to produce the desirable amount of final product (castings), the existing pouring floor space must be expanded, which will be achieved by extending the existing buildings. The building extension is the only projected physical modification of the existing process.

AFM is and will remain a Minor Source of Hazardous Air Pollutants (HAP) under Title III of the Clean Air Act at the proposed maximum production level. ACT specifically requests that LDEQ clearly state the Minor HAP Source status for AFM in the renewed permit and develop permit conditions that federally enforce HAP emission limits to less than 10 tons per year for any single HAP and less than 25 tons per year for total HAPs.

Proposed Permit

Permit 2840-00032-V1 will be the Part 70 operating permit renewal of Part 70 operating permit 2840-00032-V0 for the Amite Foundry.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	42.20	46.12	+3.92
SO ₂	2.64	3.68	+1.04
NO _X	13.09	13.82	+0.73
СО	182.31	190.87	+8.56
VOC	27.19	50.49	+23.3
Total Toxic Air Pollutants (TAP)	7.86	23.75	+15.89

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

{List the applicability and exemptions of selected items in the table below.}

ID No.	Requirement	Note
EG-01	40 CFR 60 AAa	EAFs are exempt from this requirement due to casting only finished products.

Air Quality Analysis

None

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield was not requested.

VI. PERIODIC MONITORING

None

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_X) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4) , Ethane (C_2H_6) , Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

 PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) - An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit - See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.